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March 23, 2021

BY ECF

Judge John G. Koeltl United States District Judge **United States District Court** Southern District of New York 500 Pearl Street New York, New York 10007

> Xiamin Zeng v. City of New York, et al. Re:

> > 19-CV-3218 (JGK) (KHP)

Your Honor:

Pursuant to Honor's Individual Practices, I write to certify that defendants' Memorandum of Law in Support of their Motion to Dismiss contains a word count of 6,860 words and defendants' Reply Memorandum of Law in Further Support of their Motion to Dismiss contains a word count of 2,718 words not including the Table of Contents and Table of Authorities. This letter is to further certify that defendants' papers comply with the rest of Your Honor's formatting rules.

Respectfully submitted,

Christopher D. DeLuca

Senior Counsel

By ECF cc: Xiamin Zeng Plaintiff Pro Se 110 Columbia Street Apt. 1A

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